

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ZOND, LLC,

Plaintiff,

v.

ADVANCED MICRO DEVICES, INC.,
GLOBALFOUNDRIES U.S., INC.,
GLOBALFOUNDRIES DRESDEN
MODULE ONE LLC & CO. KG, and
GLOBALFOUNDRIES DRESDEN
MODULE TWO LLC & CO. KG,

Defendants.

CIVIL ACTION NO. 13-cv-11577-LTS

DEFENDANTS' NOTICE OF FILING OF PROPOSED ORDER

Defendants GLOBALFOUNDRIES U.S., Inc., GLOBALFOUNDRIES Dresden
Module One LLC & Co. KG, GLOBALFOUNDRIES Dresden Module Two LLC & Co. KG
(collectively, "GLOBALFOUNDRIES") and Advanced Micro Devices, Inc. ("AMD")
(collectively "Defendants") respectfully submit the enclosed [Proposed] Order ("Order") for
entry by the Court.

During the June 6, 2014, Status/Scheduling Conference, the Court (Woodlock, J.)
granted Defendants' motion to stay (D.I. 59) (Electronic Clerk's Notes, June 6, 2014) and
requested the parties to submit a proposed order. Despite attempts to reach an agreement on
the text of a proposed order the parties have not been successful in doing so. More recently,
Plaintiff has not responded to Defendants' requests to finalize this issue. Accordingly,
Defendants respectfully submit the enclosed [Proposed] Order for entry by the Court.

Dated: July 17, 2014

Respectfully submitted,

By /s/ Paul J. Cronin
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**Attorneys for Defendants
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LLC & Co. KG, and GLOBALFOUNDRIES
Dresden Module Two LLC & Co. KG**

CERTIFICATE OF SERVICE

I, Paul J. Cronin, hereby certify that a true copy of the above document was served upon counsel of record for the plaintiff through the Court's electronic court filing (ECF) system, this 17th day of July, 2014.

By: /s/ Paul J. Cronin
Paul J. Cronin

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